

EXHIBIT “A”

1

<p>1. <i>Chlorophyll a</i> (Chl <i>a</i>)</p> <p>2. <i>Chlorophyll b</i> (Chl <i>b</i>)</p> <p>3. <i>Chlorophyll c</i> (Chl <i>c</i>)</p> <p>4. <i>Chlorophyll d</i> (Chl <i>d</i>)</p> <p>5. <i>Chlorophyll e</i> (Chl <i>e</i>)</p> <p>6. <i>Chlorophyll f</i> (Chl <i>f</i>)</p> <p>7. <i>Chlorophyll g</i> (Chl <i>g</i>)</p> <p>8. <i>Chlorophyll h</i> (Chl <i>h</i>)</p> <p>9. <i>Chlorophyll i</i> (Chl <i>i</i>)</p> <p>10. <i>Chlorophyll j</i> (Chl <i>j</i>)</p> <p>11. <i>Chlorophyll k</i> (Chl <i>k</i>)</p> <p>12. <i>Chlorophyll l</i> (Chl <i>l</i>)</p> <p>13. <i>Chlorophyll m</i> (Chl <i>m</i>)</p> <p>14. <i>Chlorophyll n</i> (Chl <i>n</i>)</p> <p>15. <i>Chlorophyll o</i> (Chl <i>o</i>)</p> <p>16. <i>Chlorophyll p</i> (Chl <i>p</i>)</p> <p>17. <i>Chlorophyll q</i> (Chl <i>q</i>)</p> <p>18. <i>Chlorophyll r</i> (Chl <i>r</i>)</p> <p>19. <i>Chlorophyll s</i> (Chl <i>s</i>)</p> <p>20. <i>Chlorophyll t</i> (Chl <i>t</i>)</p> <p>21. <i>Chlorophyll u</i> (Chl <i>u</i>)</p> <p>22. <i>Chlorophyll v</i> (Chl <i>v</i>)</p> <p>23. <i>Chlorophyll w</i> (Chl <i>w</i>)</p> <p>24. <i>Chlorophyll x</i> (Chl <i>x</i>)</p> <p>25. <i>Chlorophyll y</i> (Chl <i>y</i>)</p> <p>26. <i>Chlorophyll z</i> (Chl <i>z</i>)</p> <p>27. <i>Chlorophyll aa</i> (Chl <i>aa</i>)</p> <p>28. <i>Chlorophyll ab</i> (Chl <i>ab</i>)</p> <p>29. <i>Chlorophyll ac</i> (Chl <i>ac</i>)</p> <p>30. <i>Chlorophyll ad</i> (Chl <i>ad</i>)</p> <p>31. <i>Chlorophyll ae</i> (Chl <i>ae</i>)</p> <p>32. <i>Chlorophyll af</i> (Chl <i>af</i>)</p> <p>33. <i>Chlorophyll ag</i> (Chl <i>ag</i>)</p> <p>34. <i>Chlorophyll ah</i> (Chl <i>ah</i>)</p> <p>35. <i>Chlorophyll ai</i> (Chl <i>ai</i>)</p> <p>36. <i>Chlorophyll aj</i> (Chl <i>aj</i>)</p> <p>37. <i>Chlorophyll ak</i> (Chl <i>ak</i>)</p> <p>38. <i>Chlorophyll al</i> (Chl <i>al</i>)</p> <p>39. <i>Chlorophyll am</i> (Chl <i>am</i>)</p> <p>40. <i>Chlorophyll an</i> (Chl <i>an</i>)</p> <p>41. <i>Chlorophyll ao</i> (Chl <i>ao</i>)</p> <p>42. <i>Chlorophyll ap</i> (Chl <i>ap</i>)</p> <p>43. <i>Chlorophyll aq</i> (Chl <i>aq</i>)</p> <p>44. <i>Chlorophyll ar</i> (Chl <i>ar</i>)</p> <p>45. <i>Chlorophyll as</i> (Chl <i>as</i>)</p> <p>46. <i>Chlorophyll at</i> (Chl <i>at</i>)</p> <p>47. <i>Chlorophyll au</i> (Chl <i>au</i>)</p> <p>48. <i>Chlorophyll av</i> (Chl <i>av</i>)</p> <p>49. <i>Chlorophyll aw</i> (Chl <i>aw</i>)</p> <p>50. <i>Chlorophyll ax</i> (Chl <i>ax</i>)</p> <p>51. <i>Chlorophyll ay</i> (Chl <i>ay</i>)</p> <p>52. <i>Chlorophyll az</i> (Chl <i>az</i>)</p> <p>53. <i>Chlorophyll aza</i> (Chl <i>aza</i>)</p> <p>54. <i>Chlorophyll abz</i> (Chl <i>abz</i>)</p> <p>55. <i>Chlorophyll acz</i> (Chl <i>acz</i>)</p> <p>56. <i>Chlorophyll adz</i> (Chl <i>adz</i>)</p> <p>57. <i>Chlorophyll aez</i> (Chl <i>aez</i>)</p> <p>58. <i>Chlorophyll afz</i> (Chl <i>afz</i>)</p> <p>59. <i>Chlorophyll agz</i> (Chl <i>agz</i>)</p> <p>60. <i>Chlorophyll ahz</i> (Chl <i>ahz</i>)</p> <p>61. <i>Chlorophyll aiz</i> (Chl <i>aiz</i>)</p> <p>62. <i>Chlorophyll ajz</i> (Chl <i>ajz</i>)</p> <p>63. <i>Chlorophyll akz</i> (Chl <i>akz</i>)</p> <p>64. <i>Chlorophyll alz</i> (Chl <i>alz</i>)</p> <p>65. <i>Chlorophyll amz</i> (Chl <i>amz</i>)</p> <p>66. <i>Chlorophyll anz</i> (Chl <i>anz</i>)</p> <p>67. <i>Chlorophyll aoz</i> (Chl <i>aoz</i>)</p> <p>68. <i>Chlorophyll apz</i> (Chl <i>apz</i>)</p> <p>69. <i>Chlorophyll aqz</i> (Chl <i>aqz</i>)</p> <p>70. <i>Chlorophyll arz</i> (Chl <i>arz</i>)</p> <p>71. <i>Chlorophyll asz</i> (Chl <i>asz</i>)</p> <p>72. <i>Chlorophyll atz</i> (Chl <i>atz</i>)</p> <p>73. <i>Chlorophyll auz</i> (Chl <i>auz</i>)</p> <p>74. <i>Chlorophyll avz</i> (Chl <i>avz</i>)</p> <p>75. <i>Chlorophyll awz</i> (Chl <i>awz</i>)</p> <p>76. <i>Chlorophyll axz</i> (Chl <i>axz</i>)</p> <p>77. <i>Chlorophyll ayz</i> (Chl <i>ayz</i>)</p> <p>78. <i>Chlorophyll azz</i> (Chl <i>azz</i>)</p> <p>79. <i>Chlorophyll azaa</i> (Chl <i>aza</i>)</p> <p>80. <i>Chlorophyll abz</i> (Chl <i>abz</i>)</p> <p>81. <i>Chlorophyll acz</i> (Chl <i>acz</i>)</p> <p>82. <i>Chlorophyll adz</i> (Chl <i>adz</i>)</p> <p>83. <i>Chlorophyll aez</i> (Chl <i>aez</i>)</p> <p>84. <i>Chlorophyll afz</i> (Chl <i>afz</i>)</p> <p>85. <i>Chlorophyll agz</i> (Chl <i>agz</i>)</p> <p>86. <i>Chlorophyll ahz</i> (Chl <i>ahz</i>)</p> <p>87. <i>Chlorophyll aiz</i> (Chl <i>aiz</i>)</p> <p>88. <i>Chlorophyll ajz</i> (Chl <i>ajz</i>)</p> <p>89. <i>Chlorophyll akz</i> (Chl <i>akz</i>)</p> <p>90. <i>Chlorophyll alz</i> (Chl <i>alz</i>)</p> <p>91. <i>Chlorophyll amz</i> (Chl <i>amz</i>)</p> <p>92. <i>Chlorophyll anz</i> (Chl <i>anz</i>)</p> <p>93. <i>Chlorophyll aoz</i> (Chl <i>aoz</i>)</p> <p>94. <i>Chlorophyll apz</i> (Chl <i>apz</i>)</p> <p>95. <i>Chlorophyll aqz</i> (Chl <i>aqz</i>)</p> <p>96. <i>Chlorophyll arz</i> (Chl <i>arz</i>)</p> <p>97. <i>Chlorophyll asz</i> (Chl <i>asz</i>)</p> <p>98. <i>Chlorophyll atz</i> (Chl <i>atz</i>)</p> <p>99. <i>Chlorophyll auz</i> (Chl <i>auz</i>)</p> <p>100. <i>Chlorophyll avz</i> (Chl <i>avz</i>)</p> <p>101. <i>Chlorophyll awz</i> (Chl <i>awz</i>)</p> <p>102. <i>Chlorophyll axz</i> (Chl <i>axz</i>)</p> <p>103. <i>Chlorophyll ayz</i> (Chl <i>ayz</i>)</p> <p>104. <i>Chlorophyll azz</i> (Chl <i>azz</i>)</p> <p>105. <i>Chlorophyll azaa</i> (Chl <i>aza</i>)</p> <p>106. <i>Chlorophyll abz</i> (Chl <i>abz</i>)</p> <p>107. <i>Chlorophyll acz</i> (Chl <i>acz</i>)</p> <p>108. <i>Chlorophyll adz</i> (Chl <i>adz</i>)</p> <p>109. <i>Chlorophyll aez</i> (Chl <i>aez</i>)</p> <p>110. <i>Chlorophyll afz</i> (Chl <i>afz</i>)</p> <p>111. <i>Chlorophyll agz</i> (Chl <i>agz</i>)</p> <p>112. <i>Chlorophyll ahz</i> (Chl <i>ahz</i>)</p> <p>113. <i>Chlorophyll aiz</i> (Chl <i>aiz</i>)</p> <p>114. <i>Chlorophyll ajz</i> (Chl <i>ajz</i>)</p> <p>115. <i>Chlorophyll akz</i> (Chl <i>akz</i>)</p> <p>116. <i>Chlorophyll alz</i> (Chl <i>alz</i>)</p> <p>117. <i>Chlorophyll amz</i> (Chl <i>amz</i>)</p> <p>118. <i>Chlorophyll anz</i> (Chl <i>anz</i>)</p> <p>119. <i>Chlorophyll aoz</i> (Chl <i>aoz</i>)</p> <p>120. <i>Chlorophyll apz</i> (Chl <i>apz</i>)</p> <p>121. <i>Chlorophyll aqz</i> (Chl <i>aqz</i>)</p> <p>122. <i>Chlorophyll arz</i> (Chl <i>arz</i>)</p> <p>123. <i>Chlorophyll asz</i> (Chl <i>asz</i>)</p> <p>124. <i>Chlorophyll atz</i> (Chl <i>atz</i>)</p> <p>125. <i>Chlorophyll auz</i> (Chl <i>auz</i>)</p> <p>126. <i>Chlorophyll avz</i> (Chl <i>avz</i>)</p> <p>127. <i>Chlorophyll awz</i> (Chl <i>awz</i>)</p> <p>128. <i>Chlorophyll axz</i> (Chl <i>axz</i>)</p> <p>129. <i>Chlorophyll ayz</i> (Chl <i>ayz</i>)</p> <p>130. <i>Chlorophyll azz</i> (Chl <i>azz</i>)</p> <p>131. <i>Chlorophyll azaa</i> (Chl <i>aza</i>)</p> <p>132. <i>Chlorophyll abz</i> (Chl <i>abz</i>)</p>

[illegible]

THE STATE OF TEXAS

COUNTY OF HAMILTON

CAUSE NO. CV09821

TO: DEUTSCHE BANK NATIONAL TRUST, COMPANY, AS TRUSTEE FOR MORGAN STANLEY DEAN WITTER CAPITAL 1 INC. PASS-THROUGH CERTIFICATES, SERIES 2003-NC2, BY THE SECRETARY OF STATE, 1019 BRAZOS STREET, AUSTIN, TEXAS 78701 (or wherever he/she may be found)

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 day after the date you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." TRCP. 99

Court:	220 th JUDICIAL DISTRICT COURT, HAMILTON, TX 76531
Cause No.:	CV09821
Date of Filing:	10/04/2021
Document:	PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE
Parties in Suit:	JAMES RAY COMPTON VS. DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY DEAN WITTER CAPITAL 1 INC. PASS-THROUGH CERTIFICATES, SERIES 2003-NC2
Clerk:	Sandy Layhew, District Clerk, 102 N Rice, Suite 215, Hamilton TX 76531
Party Attorney:	PRO SE

Issued under my hand and seal of this said court on this the 4th day of October, 2021.

Sandy Layhew, District Clerk
220th Judicial District Court,
Hamilton County, Texas

BY:  Deputy

Service Return

Came to hand on the _____ day of _____, 20____, at _____ m., and executed on the _____ day of _____, 20____, at _____ M by delivering to the within named _____

_____ in person a true copy of this citation, with attached copy(ies) of the _____ at _____

☐ Not executed. The diligence use in finding defendant being _____

☐ Information received as to the whereabouts of defendant being _____

Service Fee: \$ _____	Sheriff/Constable _____
	County, Texas _____
Service ID No. _____	Deputy/Authorized Person _____

VERIFICATION

On this day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who has stated: upon penalty of perjury, I attest that the foregoing instrument has been executed by me in this cause pursuant to the Texas Rules of Civil Procedure. I am over the age of eighteen years and I am not a party to or interested in the outcome of this suit, and have been authorized by the Hamilton County Courts to serve process.

Subscribed and sworn to before me on this the _____ day of _____, 20____

Notary Public

** Service by Rule 106 TRC if directed by attached Court Order

CAUSE NO. CV09821

JAMES RAY COMPTON, § IN THE DISTRICT COURT

Plaintiff, §

§

v. §

§

DEUTSCHE BANK NATIONAL §

TRUST COMPANY, AS TRUSTEE §

FOR MORGAN STANLEY DEAN §

WITTER CAPITAL I INC. §

PASS-THROUGH CERTIFICATES, §

SERIES 2003-NC2, §

Defendants. §

HAMILTON COUNTY, TEXAS

FILED FOR RECORD
Hamilton County, Texas

OCT 04 2021

Sandy Layhew
Clerk 220th District Court§ 220th JUDICIAL DISTRICT**PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW PLAINTIFF, James Ray Compton, complaining of Deutsche Bank National Trust Company, As Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC-2, Mortgage Pass-Through Certificates, Series 2003-NC2 and shows as follows:

DISCOVERY CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 3 pursuant to Texas Rules of Civil Procedure 190.4.

PARTIES

2. Plaintiff, James Ray Compton is a resident of Hamilton County, Texas whose last 3 digits of his social security number are 295 and whose last 3 digits of his driver's license number are 138
3. Defendant, Deutsche Bank National Trust Company, As Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC-2, Mortgage Pass-Through Certificates, Series 2003-NC2, is a foreign corporation who does not maintain a registered agent in Texas and therefore may be served by serving the Secretary of State at 1019 Brazos Street Austin, TX 78701.

VENUE & JURISDICTION

4. This is a suit for quiet title to real property in Hamilton County, Texas. Venue is therefore proper in Hamilton County because this action involves real property located in Hamilton County, Texas according to Section 15.011 of the Texas Civil Practice and Remedies Code.
5. This Court has jurisdiction over this lawsuit because the damages sought are within the jurisdictional limits of the court and Plaintiffs seeks monetary relief of \$100,000 or less and non-monetary relief.

PROPERTY

6. The real property which is the subject of this suit is as follows:
ALL THAT CERTAIN TRACT OR LOT IN THE EIDSON AND PIERSON ADDITION OF HAMILTON IN HAMILTON, TEXAS AND BEING THE SOUTH 65 FEET OF LOT 2, BLOCK 14 OF SAID ADDITION, THE NORTH LINE OF SAID TRACT IS PARALLEL TO THE SOUTH LINE OF SAID LOT 2 AND THE EAST AND WEST LINE OF SAID LOT ARE ON THE EAST AND WEST LINE OF SAID LOT 2, RESPECTIVELY.

Also known as 1308 S. Dempster Hamilton, TX 76531

FACTS

7. Defendant filed suit in the 220th District Court seeking an expedited order allowing foreclosure of the real property.
8. Defendant has posted the property for foreclosure on October 5, 2021.
9. Plaintiff did not receive a notice of default with 20 days to cure the default as required by Section 51.002 (d)
10. Plaintiff did not receive notice of the foreclosure sale at least 21 days ahead of time as required by Section 51.002(b) of the Texas Property Code.

QUIET TITLE

11. Plaintiff has an interest in the specific property that is the subject of this suit and Defendant's posting of the Notice of Substitute Trustee Sale affects Plaintiff's title to the property. Defendant's claim to the property, while facially valid, is invalid or unenforceable.
12. Plaintiff seeks a declaration from the Court that the cloud upon his title to the property created by Defendant's posting of the Notice of Substitute Trustee Sale should be removed.

VIOLATION OF TEXAS CONSTITUTION ARTICLE 16

13. The amount of the home equity loan, \$30,400.00, was more than eighty percent of the fair market value of the property at the time the loan was made. Section 50(a)(6)(B).

PRAYER

Wherefore, premises considered, Plaintiff prays that upon final trial of this matter, Plaintiff have and recover the following relief:

- a. Removal of cloud upon Plaintiff's title; and
- b. All other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,


James Ray Compton
1308 S. Dempster
Hamilton, TX 76531

CAUSE NO. CV09821

JAMES RAY COMPTON,	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
v.	§	
	§	220th DISTRICT COURT
DEUTSCHE BANK NATIONAL	§	
TRUST COMPANY, AS TRUSTEE	§	
FOR MORGAN STANLEY DEAN	§	
WITTER CAPITAL I INC. PASS	§	
THROUGH CERTIFICATES, SERIES	§	HAMILTON COUNTY, TEXAS
2003-NC2,	§	
	§	
Defendants.	§	

**DEFENDANT’S ORIGINAL ANSWER AND AFFIRMATIVE DEFENSES TO
PLAINTIFF’S ORIGINAL PETITION**

Defendant Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2¹ (“*Defendant*”) files this Original Answer and Affirmative Defenses to Plaintiff James Ray Compton’s (“*Plaintiff*”) Original Petition and Request for Disclosure (the “Original Petition”) and respectfully shows the Court the following:

I. GENERAL DENIAL

1. Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Defendant generally denies each and every claim, charge, and allegation contained in Plaintiff’s Original Petition, and requests that the Court require Plaintiff to prove his claims by a preponderance of the credible evidence.

¹ Erroneously sued as Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Pass Through Certificates, Series 2003-NC2.
616217.2 105474.0061

II. AFFIRMATIVE DEFENSES

2. Some or all of Plaintiff's claims are barred because Plaintiff has failed to satisfy one or more conditions precedent to recovery.

3. Some or all of Plaintiff's claims are barred by the doctrines of waiver, ratification, unclean hands and/or estoppel.

4. Some or all of Plaintiff's claims are barred because Plaintiff failed to make payments as agreed and therefore is in default and breached the agreement that is the subject of this action.

5. Any damages sustained by Plaintiff (the existence of which is denied) were the result of acts or omissions of parties other than Defendant, for which Defendant is not legally responsible.

6. Plaintiff has not sustained any damages proximately caused by Defendants.

7. Plaintiff's claims are barred, in part or in whole, by the statute of frauds.

8. Plaintiff's claims are barred, in part or in whole, by the applicable statutes of limitations.

9. Plaintiff's claims are barred, in part or in whole, by contractual and/or equitable subrogation.

10. Plaintiff fails to state a claim upon which relief can be granted.

11. Defendant reserves the right to assert any additional affirmative defenses that may be discovered during the course of additional investigation and discovery.

WHEREFORE, Defendant respectfully prays that Plaintiff take nothing by reason of the claims as alleged, and for such other and further relief to which this Court deems it to be justly entitled.

Respectfully submitted,

By: /s/ Greg DeVries

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ATTORNEYS FOR DEFENDANTS.

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2021, a copy of the above and foregoing was filed electronically with the Clerk of Court using the Court's electronic filing system. Notice of this filing has been forwarded to all parties, by and through their attorneys of record by operation of the Court's electronic filing system.

Via CMRRR and/or Via Texas E-Filing Service System

James Ray Compton

1308 S. Dempster

Hamilton, Texas 76513

Plaintiff

/s/ Greg DeVries

Greg DeVries

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Sherri Johnson on behalf of Greg DeVries
 Bar No. 24105802
 sajohanson@mcglinchey.com
 Envelope ID: 59045516
 Status as of 11/10/2021 2:13 PM CST

Associated Case Party: Defendant Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2

Name	BarNumber	Email	TimestampSubmitted	Status
Gregory SDeVries		gdevries@mcglinchey.com	11/10/2021 2:01:23 PM	SENT
Brian A.Paino		bpaino@mcglinchey.com	11/10/2021 2:01:23 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Sherri Johnson		sajohanson@mcglinchey.com	11/10/2021 2:01:23 PM	SENT